

PLAINTIFF'S MOTION FOR CHANGE OF VENUE FROM THE U.S. DISTRICT COURT

101 West Baltimore Street, Baltimore, MD 21202

To: Bankruptcy Appellate Panel of the Sixth Court
540 Potter Stewart U.S. Courthouse
100 East Fifth Street
Cincinnati, Ohio 45202
(513) 564-7000

ENTERED
JUL 16 2013
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

Now Comes Dr. LaDonna Jones, Pro Se Litigant and request this Honorable Court to transfer her case WMN 12-3559 from the U.S. District Court of Maryland to the Bankruptcy Appellate Panel of the Sixth Court.

1. Dr. LaDonna Jones is a resident of Ohio. She has resided in Ohio for quite some time. Her current address is 6306 Meadow Brook Road, Garfield Heights, OH 44125. Dr. LaDonna has been going back and forth for over two years. She has endured great financial hardship by trying to keep court dates and respond to Motions. Since the case began in Maryland and all proceedings at the U.S. District Court, are to be appealed, Dr. Jones is requesting that the Bankruptcy Appellate Panel of the Sixth Circuit Court hear these matters.
2. Normally the fourth Circuit for the District of Maryland would hear Dr. Jones' case. It would cause Dr. Jones great hardship to travel to Virginia.
3. No pleadings have been filed and the case is starting anew. It would not cause any delay or procedure problems.
4. All Defendants in this matter are residents of Maryland. They are all high profile and very rich attorneys and therefore, they will not suffer any financial hardships. It would only take them one hour to get to the Appellant's court by plane and four hours to get to the Virginia Court by vehicle.
5. The primary witness which is Dr. LaDonna Jones is a resident of Ohio. Venue in a bankruptcy case is governed by § 1408 of title 28 of the U.S. Code. Section 1408 provides that a debtor may file its bankruptcy case (1) in any district court where the debtor's domicile, residence, principal place of business, or principal assets are located, or (2) in any district court where an affiliate, general partner, or partnership of the debtor has a case pending.
6. Dr. LaDonna Jones is the moving party and the forum for her request is still the same from one Appellant Court to another Appellant Court in her home state.
7. In the State of Maryland, great deference is giving to the victims of their choice of venue. Scott v. Hawit – Tracy Scott, as Maryland and Next Friend of Charlie Scott, a Minor v. Raja HAWIT, et al. No. 2838, Sept. Term, 2011. – May 03, , 2013 DEBORAH S. EYLER, WATTS, LAWRENCE F. RODOWSKY, (Retired, Specially Assigned).

Respectfully Submitted,

Dr. LaDonna Jones

CERTIFICATE OF SERVICE

I certify that I have mailed true copies of the above mentioned Motion by first class mail, postage prepaid on the 16th day of July, 2013 to the following.

Mark Kivitz, Esq.
201 N. Charles Street
Baltimore, MD 21201
410-625-2300

cc: LaDonna Jones

Dr. LaDonna D. Jones
6306 Meadow Brook Road
Garfield Heights, OH 44125

cc: Department of Justice